



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-11

17 MAY 1988

Mr. Geoffrey K. Barnes
Squire, Sanders & Dempsey
1800 Huntington Building
Cleveland, Ohio 44115

Re: Remedial Design/Remedial Action Work Plan
Alternative Water Supply Project
Industrial Excess Landfill Superfund Site

Dear Mr. Barnes:

Please find enclosed the United States Environmental Protection Agency (U.S. EPA) comments on the Remedial Design/Remedial Action (RD/RA) Work Plan for the Industrial Excess Landfill site. The RD/RA Work Plan was submitted to the U.S. EPA on behalf of the Goodyear Aerospace Corporation, Goodyear Tire & Rubber Company, B.F. Goodrich Company, and Firestone Tire & Rubber Company, in accordance with the CERCLA Section 106 Administrative Order, U.S. EPA Docket No. V-W-87-C-031. The Ohio Environmental Protection Agency comments are consolidated into the U.S. EPA comments.

In general, the plan was complete. However, there are major deficiencies in the project organization section, and minor problems in other sections. In accordance with the schedule in the RD/RA Work Plan, please provide the next draft of the RD/RA Work Plan to the appropriate parties within twenty-one (21) calendar days of your receipt of these comments.

If you have any questions, please feel free to call me at (312) 886-9894.

Sincerely,

A handwritten signature in cursive script that reads "Therese Gioia".

Therese Gioia
Enforcement Remedial Project Manager

Enclosure

cc: David Meredith, Baker Engineers
Rod Beals, OEPA
Roger Hannahs, OEPA

U.S. EPA COMMENTS
IEL RD/RA WORK PLAN

1. Section 1.1: Please correct the factual errors contained in the first two paragraphs as follows: The public meeting was held after the issuance of the FFS and the Proposed Plan. These two documents recommended the Village of Lakemore as the source for the alternative water. As a result of public comment, including the identification of an additional source of water (Country Club Village System) by the rubber company potentially responsible parties (PRPs), U.S. EPA signed a Record of Decision (ROD) to design and construct an alternative water supply, but deferred the selection of the source of the water. The source was to be selected after further evaluation of the Country Club Village, Village of Lakemore, and City of North Canton systems. Several months after the ROD was signed, U.S. EPA selected the Country Club Village system as the source in a supplement to the ROD. The Country Club Village system was the most cost-effective source, all other factors being equal for the three sources under consideration.

Revise the 1st sentence of the 3rd paragraph (underlined portions indicate additions) as follows: "Subsequent to the issuance of the ROD and the selection by U.S. EPA of the Country Club Village System, discussions were held...to the IEL site. These discussion have resulted in the selection of the City of North Canton system by the Companies as the ...source."

2. Section 1.3: The organization must be finalized in the work plan. The Project Coordinator for the Companies must be identified and all the contractors conducting work on this project, with a detailed description of all activities each contractor will conduct, must be identified.

The lines of responsibility and communication must be clear. Also include the names of the U.S. EPA Project Coordinator and the OEPA Project Coordinator. U.S. EPA maintains that the Companies are responsible for the implementation of the work outlined in the 106 Order. The County's role is equivalent to that of a subcontractor for the Companies. As far as U.S. EPA is concerned, the County is a secondary participant in this project; the Companies are responsible for complying with the 106 Order.

U.S. EPA is not concerned with the side-bar agreements between the State and the County or between the County

and the Companies. In addition, U.S. EPA will manage its agreement with the State and will not make that agreement a subject of this Work Plan. The driving force in this project is the relationship between U.S. EPA and the Companies established by the 106 Order. The 106 Order should be mentioned in this work plan. In addition, through its permitting authority, OEPA will be very involved in the project.

3. Page 2-1: OEPA has pointed out that according to Ohio EPA-DPWS records, the North Canton Water Treatment Plant operated at 70 percent of capacity (2.8 MGD) in 1986 and 87 percent of capacity (3.5 MGD) in 1987. OEPA records also indicate that the water treatment plant exceeded its rated capacity of 4.0 MGD on 58 days in 1986 and 52 days in 1987. OEPA will approve the Companies design plans to serve only the approximate 100 house service connections adjacent to the IEL site. Additional service connections or water line extensions from the trunk main will not be approved until adequate additional water supply and treatment capacity is available.
4. Page 2-2: Include the proposed location of the master meter on Plate 1.
5. Page 2-3: Well Abandonment: This Work Plan should note that any owner of a non-contaminated private well who refuses to have it abandoned will be subject to special requirements under Ohio law. Connection of a auxiliary water system (including a private well) to a public water system is prohibited by Section 6109.13 of the Ohio Revised Code (ORC) and Section 3745-95-02(B) of the Ohio Administrative Code (OAC), Section 3745-95-02(B)(1) further requires that an approved reduced principle back flow prevention (RP) device be installed on the service line of any customer who has such a private well, even though the well supply is completely separated from the public water supply.

In addition, any customer who does not have their private well removed must have his plumbing system inspected at least yearly to ensure that the well remains disconnected from the public water supply, and must have the RP device on his service connection tested at least yearly by an approved back flow prevention device tester.

OAC 3701-28-07(B) requires that all wells not being used for obtaining groundwater and for determining the quality, quantity, or level of groundwater shall either be permanently abandoned or maintained in strict compliance with all applicable requirements of OAC Chapter 3701-08, Ohio

Department of Health rules for Private Water Systems. OAC 3701-28-07(C) requires any person intending to abandon a private water system to notify the Ohio Department of Health.

6. Page 2-4, 2-5: Remove most of the discussions prior to 2.3 except paragraphs one and three. The various agreements between the parties involved are not a concern of this work plan. In addition, U.S. EPA does not have approval or disapproval authority over such agreements. Please add the following to paragraph 3: The proposed water supply agreement between Stark County and the City of North Canton must be approved by the Director of the OEPA before going into effect in accordance with Section 6103.22 of the ORC. Delete the time lines for the side-bar agreements not of concern in this work plan from page 2-5 and from the Summary Schedule.

7. Section 2-3: Do the Companies propose to obtain subsurface soil information along the proposed alignment, at major structures and other critical areas? Do the Companies anticipate a need for a geotechnical investigation to determine excavation depths, soil conditions at and below pipe invert and at proposed structure locations. Such information may impact alignment selection, construction requirements, design factors, and cost estimations.

Add that the Preliminary Design submission will contain a detailed map of the area to receive the alternative water, including service hook-ups.

Add the following item to Section 2.3: Construction of the proposed public water supply facilities cannot begin until detailed plans have been approved by the Director of OEPA in accordance with ORC Section 6109.07.

For your information, the "Ten States Standards" prohibits the use of PVC pipe or any other pipe and joint material which may be subject to permeation by organic compounds in areas of groundwater contaminated by organic compounds. Such materials may not be used in the vicinity of IEL.

8. Section 4: Who will be writing the Access Plan? Add access for the storage tank to the second to the last paragraph of 4.3.

9. Section 5: Who will write the Construction Oversight Plan? Page 5-2 - The monthly progress reports are required by the 106 Order and must be submitted throughout the term of the project, not just during construction. This should be clarified in

the work plan. Page 5-4 - The Remedial Action Final Report discussion should be put in its own section, just before the existing Section 10.

10. Section 6: Who will prepare the QAPPC?
11. Section 7-2: Who will prepare the Health and Safety Plan? Typo in 3rd Bullet - "(TVL)" should be "(TLV)".
12. Section 8.0: Who will prepare the O&M Plan? The proposed ownership of the system should also be discussed in this section.
13. Section 9, Page 9-2: Remove any time allotted in the Project Bidding Phase for construction financing. The County must arrange its financing during design of the project. The construction of the water system will not be delayed so the County can arrange for financing.
14. Section 10: Delete the first bullet on page 10.1
15. Attachment 1, Page (a), A.2: Include additional private well(s) directly north of the site (in the Amber Circle residential area) in the monitoring program. Add a sentence to explain that the complete rationale for selecting which private wells to use for the monitoring (e.g. depth of the well and the screened interval) will be provided in the sampling plan. The flow rate of 200 ft/yr cannot be verified through this monitoring program. U.S. EPA may have underestimated the flow rate in the FFS and is currently recalculating the flow rate. In light of this uncertainty, the nearest uncontaminated private wells to the area of contamination should be used in the monitoring program. The monitoring program must also address both aquifer systems near the site, the sand and gravel and bedrock, if possible. This may require more than the proposed number of sampling locations, depending on whether appropriate sand and gravel and bedrock private wells exist in the area to be tested.
16. Attachment 1, Page (b), 3.a: Because the ground water is probably moving much faster than originally thought, the sampling frequency will be quarterly.
17. Attachment 1, Page (b), 3.b: Add that the Field QA/QC will also describe the procedures for collecting the samples.

18. Attachment 1, Page (b), 4.a: A Full HSL scan should be run on all ground water samples. In addition, the Companies' laboratory should provide information on all Tentatively Identified Compounds (TICs).
19. Attachment 1, Page (d), 4th Bullet: "Verifiability" be "variability"?
20. Attachment 1, Page (d); Add that a pre-QAPP meeting between U.S. EPA, the Companies, the Companies' laboratory, and any other involved individuals will be held prior to submission of the QAPP and that the QAPP will be drafted in accordance with the agreements reached at the pre-QAPP meeting.
21. Attachment 1: Include a statement at the beginning of this attachment that post-construction groundwater monitoring will be conducted as part of the final site RD/RA.
22. Attachment 2, Page (f), B.2: Define ANWA.
23. Attachment 2, Page (b), F.2: You may also want to have a road map, with the roads to the nearest hospital highlighted, available for the operators.
24. Attachment 2, Page (i), G.2: Define AWWA.
25. Summary Schedule: Remove time lines for all negotiations except those between Stark County and the City of North Canton. Shorten the time for the Project Bidding Phase by removing time allotted for construction financing by Stark County.